

		Service Area	Estimated Households
89.	W96CG	Greensburg, PA.	120,000
	1. Local News		
	2. Live Sports		
	3. Talk Shows over City Affairs		
	4. City Commission Meetings		
90.	W57BH	Stubenville, OH	80,000
	1. Local News		
	2. Live Sports		
	3. City Commission Meetings		
	4. Live Interaction Local Issues		
91.	W26AV	Charleroi, PA	50,000
	1. Local Sports		
	2. Local News		
	3. Miscellaneous Programs		
	4. City & County Commission Meetings		
92.	W60BL	Butler, PA	60,000
	1. High School Sports		
	2. Local News		
	3. Children Programming		
93.	W62BT	Mansury, OH	150,000
	1. Local News		
	2. Local Sports		
	3. High School Sports		
	4. Interacting Program with City Commission		

		Service Area	Estimated Households
94.	W40AF	Carlisle, PA	20,000
	1. High School Program		
	2. Local News		
	3. Local Sports		
95.	W50BF	Wall, PA	5,000
	1. Local & Highschool News		
	2. Local Sports		
	3. Working at Home		
	4. Talk Shows		
	5. Local Affairs		
96.	KQEG - LP	LaCrosse, WS	35,000
	1. Minority Affairs		
	2. Local News		
	3. Local Sports		
97.	WYHB	Chattanooga, TN	50,000
	1. Local Sports		
	2. Local News		
	3. Afro-American Programs		
	4. School Games		
	5. City Meetings		
98.	WTCN - Ch 16	Martin & St. Lucie, FL	150,000
	1. Local Sports		
	2. Local Weather		
	3. Children Programming		
	4. Political Issues		
	5. Health Specials		
	6. Talk Shows		

		Service Area	Estimated Households
99.	WIWU - LP - Ch 51	Grant County, IN	45,000
	1. Talk Shows		
	2. Local Sports		
	3. Health Issues		
100.	K17BY - Ch 17	S. Antonio, TX	200,00
	1. Special Language		
101.	K22BH - Ch 22	Corpus Christi, TX	100,000
	1. Special Language		
102.	K45DB - Ch 45	Corpus Christi, TX	100,00
	1. Video Jukebox		
103.	K67FY - Ch 67	Austin, TX	150,000
	1. Video Jukebox		
104.	K22DX - Ch 22	Boise, ID	150,000
	1. Children Programming		
	2. Health Issues		
	3. Local - Religious Programs		
105.	KKYK	Little Rock, AR	200,000
	1. Local Programming		
	2. Minority Programming		
	3. High School Football Games		
106.	WFND	Findlay, OH	140,000
	1. Local Sports		
	2. Local News		
	3. Morning Shows		
	4. Minority Programming		

	Service Area	Estimated Households
107. KOKT	Sulphur, OK Ada/Ardmore & Sherman, TX	100,000
1. Local Programming		
108. WYCN Ch 13	Nashua, NH	100,000
1. Community Bulletins		
2. Community Affairs		
3. High School / College Sports		
109. W33AK	Greater Nashua, NH	100,000
1. Community Affair		
2. Health Programming		
3. Civic Affairs		
4. Local Sports		
110. KDCG - Ch 22	Greater St. Landry Parish LA	50,000
1. Local News		
2. Sports		
3. Health Issues		
4. Business Profiles		
5. Financial Matters		
111. WFBT - Ch 23	Chicago. IL	6,482, 428
Ethnic Programming:		
Lithuanian		
Ukrainian		
Philippine		
Romanian		
Korean		
Taipei		
Financial Programming		

	Service Area	Estimated Households
112. W65BT Ch 65	Milwaukee, WI	1,273,000
Ethnic Programming Lithuanian Ukrainian Philippine Romanian Korean Taipei Financial Programming		
113. W46AR	Milwaukee, WI	1,230,000
1. Full-Time Univision Affiliate (Spanish) 2. Local psa's and soon to be news breaks		
114. WBND/W69BT Ch 58/69	South Bend, IN	618,700
1. Full-Time ABC Affiliate		
115. W33AR Ch 33	Rockford, IL	241,000
1. Stock Market Observer (Financial) 2. Soon to add ethnic programming		
116. W12BK	South Bend, IN	216,900
1. Stock Market Observer (financial) 2. Soon to add ethnic		
117. W69BP	Richland & Ashland Counties, OH	88,720
1. Evening News 2. Diner's Club 3. Buyer's Club 4. Highschool Sports 5. Children's Hospital Telethon 6. Local events		

118. Chattanooga, TN WYHB - 39
1. Local Sports
 2. Local News
 3. Local Medical Show
 4. Talk show with local call in.
119. Memphis, TN W57CG - 57
1. Local News
 2. Local Religious services
120. Salinca, TN W06AW - 6
1. Local Interviews
 2. Local Government Office
 3. Local News
 4. County Commissioners Meetings
121. Hampton, VA W51BH - 51
1. Local News
 2. Local Sports
 3. Local Interviews City Meetings, etc..
122. The Dallas, OR KRHP - 14
1. Local News Program
 2. Hearing Impaired
 3. through the UHF - feeds out to the Communities through 25 Cable channels that feed to the many rural communities that would have no television programs available.
 4. Religious Services

APPENDIX 3

Reply Comments of the Community Broadcasters Association

MM Docket No. 87-268

Letter from Third Coast Broadcasting, Inc. to NTIA

THIRD COAST BROADCASTING

January 21, 1997

Mr. Timothy R. Robinson
Attorney Advisor
NTIA Room 4713
14th St & Constitution Ave N.W.
Washington DC 20230

Reference: Letter Of Clarification:

Community Broadcasters Association
Comments to FCC 6th Further Notice of
Proposed Rulemaking.

Dear Tim:

Further to our conversation on the 14th, the CBA recognizes that there is a possible misinterpretation which can be made from Section I in the Technical Exhibit of the CBA's Comments. In speaking with Bruce Franca, in the FCC OET, he indicated a concern that the comments could be taken beyond what was intended, and we agree that there is a possible interpretation along those lines. We will be clarifying the Comments in the CBA's Reply Comments, as follows:

In Section I of the Technical Exhibit, the CBA proposes that there should be comparable standards for both full power TV stations and LPTV stations. This section indicates that there is a large difference between what is required of LPTV and that which is required of full service TV stations. Due to the extreme spectrum shortfall in the proposed DTV system, particularly with LPTV stations being displaced under the proposal, the proposed interference equity is a method of making available frequencies in areas which may be unnecessarily restricted under the current LPTV interference rules.

In establishing the spacing criteria for full power TV stations, the Commission has not required full service TV stations to locate sufficiently far from each other to meet the 50/10 interference rules. The more restrictive 50/10 interference standard is currently required of LPTV stations, with regard to TV stations as well as other LPTV stations. After four decades of field experience with the FCC full power spacing requirements, while the spacing requirements do not meet the full theoretical interference protections, in practice they do work very well. The public has not experienced widespread disruption of television service due to these spacing criteria. Therefore, the Commission was correct in specifying such spacing. In the public interest of reducing the impact on LPTV services, the CBA, in its Comments and Technical Exhibit proposes that the FCC establish interference equity between the full service TV stations and the LPTV stations, where the LPTV stations would be permitted to create the same ratios which would be caused by full service stations.

However, in subsequent meetings at the Commission, it has become apparent that there is a misunderstanding of the scope of the proposal. As is indicated in Figure 1, a point which needs clarification is that the CBA does not propose in any way to locate the LPTV station within the protected contour of any full service NTSC TV station other than for co-located adjacent channel applications, which are currently being granted. Although it could be understood from Section I that any area declared to receive interference from a proposed TV station could be used for LPTV, the CBA proposes only that an LPTV station outside of the NTSC TV station's protected contour would be able to present the same signal strength at that contour as would be permitted by a full service TV station (See Figure 1, below).

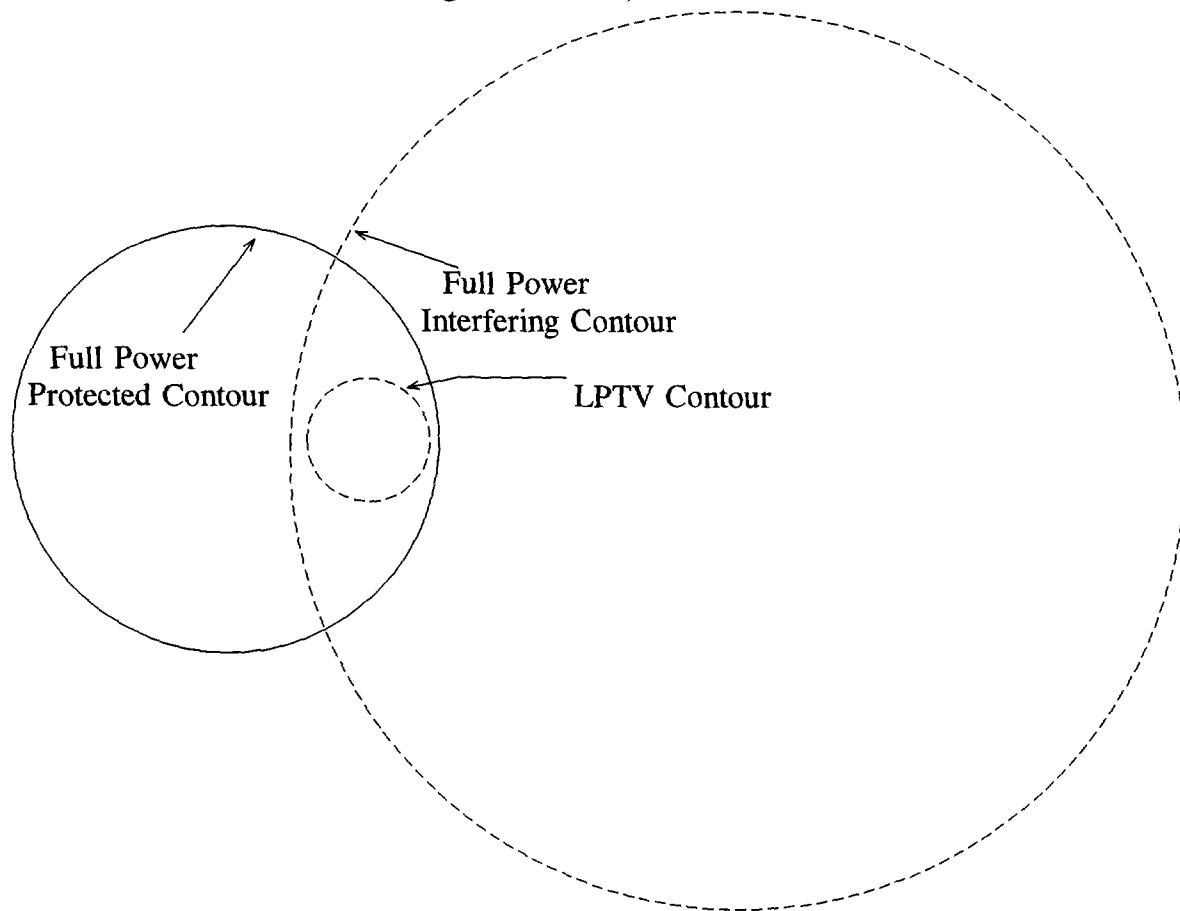


Figure 1. Scenario not Proposed by CBA

In the above figure, the LPTV station is shown to be fully located within an area which would receive theoretical (50/10) interference from the proposed full service station. This is the scenario that is not being proposed by the CBA. It is recognized that this scenario would create severe interference for the protected station, and should not be permitted, unlike what is being proposed to permit LPTV stations to present the same levels of signal that are now permitted by full service stations to each other.

Tim, I hope this clarifies a possible misinterpretation of what the CBA intends in its Comments.
If you have any questions or need further information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Fisher", written over the printed name.

Robert W. Fisher
Communication Consultant

CERTIFICATE OF SERVICE

I, Laura Ann Campbell, do hereby certify that I have sent copies of the foregoing:
"Reply Comments of the Community Broadcasters Association" by hand delivery on the 24th
day of January, 1997 to the following:

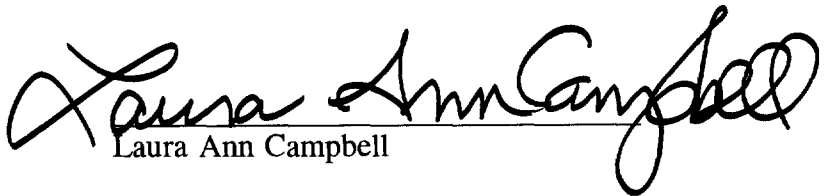
Mr. Bruce Franca
Federal Communications Commission
2000 M Street, NW, Room 480
Washington, DC 20554

Mr. Roy J. Stewart
Federal Communications Commission
1919 M Street, NW, Room 314
Washington, DC 20554

Mr. Keith Larson
Federal Communications Commission
1919 M Street, NW, Room 314
Washington, DC 20554

Mr. Robert Eckert
Federal Communications Commission
2000 M Street, NW, Room 270
Washington, DC 20554

Mr. Alan R. Stillwell
Federal Communications Commission
2000 M Street, NW, Room 480
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Laura Ann Campbell